

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

<b>IN RE:</b>	)	<b>CHAPTER 13 PROCEEDING</b>
	)	
<b>Corey R. Nenadal</b>	)	<b>CASE NO.: 19-62395</b>
<b>Holly N. Nenadal,</b>	)	
	)	<b>JUDGE KENDIG</b>
<b>DEBTOR(S)</b>	)	
	)	<b>MODIFICATION</b>
	)	

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Now come Debtors, Corey and Holly Nenadal, by and through undersigned counsel, to request a modification of their Chapter 13 plan pursuant to 11 U.S.C §1329(a) and Federal Rules of Bankruptcy Procedure 3015(g).

Debtors need to replace their 2010 Chevrolet Equinox. They have found a suitable replacement (the information for which has been submitted to the trustee). In order to afford the monthly payment of \$429.41 on the proposed vehicle, Debtors propose the following modification to their current plan:

1. Debtors' Chapter 13 payment will decrease to \$1000 per month starting with the November 2021 payment.
2. The Trustee is authorized to refund any money received in excess of the \$1000 for the months of March 2022, April 2022, and May 2022, if necessary, while the Modification is pending.
3. The Chapter 13 payment will increase to \$1,061 in November 2022 when Debtor-wife's 403(b) loan ends.
4. The Chapter 13 payment will increase to \$1,537 in September 2023 when Debtor-husband's 401(k) loan ends.
5. Debtor-husband will continue sending his monthly net bonuses to the trustee.
6. Payment to general unsecured creditors will be reduced from 100% to pot%.

Wherefore, Debtors pray the Court approve the modification and grant such other relief as may be just and appropriate.

Respectfully submitted:

/s/ Jennifer E. Donahue  
Jennifer E. Donahue (0095827)  
Rauser & Associates  
401 W. Tuscarawas St. #400  
Canton, OH 44702  
330-456-6505  
330-456-6506 (fax)

**NOTICE OF MODIFICATION OF CONFIRMED PLAN**

Debtor(s) have filed papers with the Court for a modification of their Chapter 13 plan.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may want to consult one.)**

If you do not want the Court to grant the relief requested, or if you want the court to consider your views on the modification, then on or before **March 31, 2022** you or your attorney must:

**File with the Court a written request for a hearing and a written response explaining your position at:**

Clerk of Courts  
Ralph Regula Federal Building  
and U.S. Courthouse  
401 McKinley Ave, SW  
Canton, OH 44702

If you mail your request and response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

**You must also mail a copy to:**

Jennifer E. Donahue  
Rauser & Associates  
401 W. Tuscarawas #400  
Canton, OH 44702

Dynele Schinker-Kuharich, Trustee  
200 Market Ave N #LL30  
Canton, OH 44702

**If you or your attorney do not take these steps, the court may decide that you do not oppose the modification and the court may approve the modification.**

March 2, 2022

/s/ Jennifer E. Donahue  
Jennifer E. Donahue (0095827)

**CERTIFICATE OF SERVICE**

I hereby certify that the Modification and Notice were electronically transmitted on or about March 2, 2022 via the Court's CM/ECF system to the following who are listed on the Court's Electronic Mail Notice:

Dynele L Schinker-Kuharich, Jennifer Donahue, and US Trustee.  
And by regular mail to: parties on the matrix

/s/ Jennifer E. Donahue  
Jennifer E. Donahue (0095827)